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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

May 2, 2011

TO: Internal File

THRU: James Owen, Team Lead JO

FROM: Priscilla Burton, CPSSc, Environmental Scientist III PWB/mjs

RE: Change to Year 1 Mining Sequence, Coal Hollow Mine, Alton Coal Development, LLC, Kane County, C/025/005, Task ID #3812

SUMMARY:

The April 18, 2011 revision reverses the sequence of pits 2 and 3 shown on Dwg 5-10 as approved on March 2, 2011. The change in mining sequence allows for *in situ* (in place) storage of subsoil in the vicinity of Robinson Creek until such time as the mining advances to the north. If the Permittee prefers to store subsoil *in situ* rather than salvage and store in a subsoil stockpile, then the MRP must be amended to indicate the *in situ* storage and the accompanying protection and signage. Please note that soils in unnumbered pits represented by RDV-5 and RDV-7 should not be salvaged to a depth greater than 24 inches due to high pH and SAR below this depth. Based on the information provided in the MRP, soils represented by RDV-6 can be salvaged to a greater depth.

The application should be approved with the following requirement:

R645-301-122, In what appears to be an error created by duplication, the analytical information for soil sample locations only incomplete information for Intermountain Laboratories soil analysis reports could be found. (see missing information in IML Report dated 11/13/2006 , work order # SO609512 and IMP Report dated 11/14/2006, work order # S0610051.) It is critical that complete analytical reports be located and provided to the Division.

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TECHNICAL ANALYSIS:

OPERATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

Analysis:

Topsoil Removal and Storage

Dwg. 2-2 illustrates topsoil removal and storage locations as well as the source of topsoil live-haul for contemporaneous reclamation sites. Four topsoil stockpiles and a subsoil pile will be located as shown on Drawing 2-2. The April 18, 2011 revision reverses the sequence of pits 2 and 3 shown on Dwg. 5-10 as approved on March 2, 2011. The change in mining sequence allows for *in situ* (in place) storage of subsoil in the triangle bounded by the Robinson Creek diversion and the natural Robinson Creek until such time as the mining advances to the north. If the Permittee prefers to store this subsoil *in situ* rather than salvage and store in a subsoil stockpile #1, then the MRP must be amended to indicate the *in situ* storage and the accompanying protection and signage. Further, the delay in subsoil handling from this triangle must not delay seeding and sediment control measures that are required for Subsoil Stockpile #1, as described in Section 231.100 and 231.400 of the MRP.

In this Robinson Creek area, the total recoverable subsoil depth is reported in Appendix 2-1, Table 5-1 as 22 - 30 inches for the map units 3 & 4, due to pH and SAR values. Appendix C of Appendix 2-1 provides a summation of the laboratory data from soil sample sites RDV-5 and RDV-7 representing soils extending 400 ft. south from the northern Robinson Diversion and RDV-6 representing soils extending the remainder of the distance (approximately 600 ft.) to the original creek bed. Soils represented by RDV-5 and RDV-7 should not be salvaged to a depth greater than 24 inches due to high pH and SAR below this depth. Based on the information provided in the MRP, soils represented by RDV-6 can be salvaged to a greater depth.

During an inspection on March 29, 2011, the Permittee stated that 48 inches had been stripped from the equipment storage yard to the east of the original Robinson Creek channel. This soil is represented by soil pit 33, and soils pit 32 and CH-1-05. Soil pit 33 and 32 laboratory data is missing from Appendix C of Appendix 2-1. CH-1-05 data indicates the surface 6 ft pH and SAR values are suitable.

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Appendix 2-1, p. 1-5 explains that 40 of the 182 soil pits were sampled for analysis. Incomplete information for these 40 samples could be found in Appendix C of App. 2-1. It is critical that the complete analytical reports be located.

Soil sampling information from soils salvaged and stored in existing topsoil and subsoil stockpiles is overdue and should be provided to the Division without further delay.

Findings:

The application should be approved with the following requirement:

R645-301-122, In what appears to be an error created by duplication, the analytical information for soil sample locations only incomplete information for Intermountain Laboratories soil analysis reports could be found. (see missing information in IML Report dated 11/13/2006 , work order # SO609512 and IMP Report dated 11/14/2006, work order # S0610051.) It is critical that complete analytical reports be located and provided to the Division.

RECOMMENDATIONS:

The application should be approved with the requirement of providing the missing laboratory analyses. If the Permittee prefers to store subsoil *in situ* rather than salvage and store in a subsoil stockpile, then the MRP must be amended to indicate the *in situ* storage and the accompanying protection and signage. Please note that soils in unnumbered pits represented by RDV-5 and RDV-7 should not be salvaged to a depth greater than 24 inches due to high pH and SAR below this depth. Based on the information provided in the MRP, soils represented by RDV-6 can be salvaged to a greater depth.

Soil sampling information from soils salvaged and stored in existing topsoil and subsoil stockpiles is overdue and should be provided to the Division without further delay.